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IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re:  
JAMES JOEL HOLMAN and  
CANDICE EVANGELINE HOLMAN,  
Debtors.  
\_\_\_\_\_  
DWIGHT and LAURA DANIELS,  
husband and wife  
Plaintiffs,  
vs.  
JAMES JOEL HOLMAN and  
CANDICE EVANGELINE HOLMAN,  
Defendants.  
\_\_\_\_\_

Case No. 14-35381-rld7

Adv. Proc. No. 14-03285-rld

**MOTION TO EXTEND STAY OF  
ENFORCEMENT OF JUDGMENT  
PENDING POST JUDGMENT MOTIONS**

(Oral Argument Requested)

COMES NOW, defendant James Joel Holman, and moves the court for an order extending the stay of enforcement of the Judgment entered in this matter on September 8, 2015, until such time as the pending post judgment motions have been adjudicated.

DATED this 22 day of September, 2015.

LAW OFFICE OF PAUL HEATHERMAN PC

/s/ Paul B. Heatherman  
Paul B. Heatherman - OSB #933000  
Attorney for Debtors/Defendants

1 - Motion to Amend Findings

Law Office of  
Paul Heatherman PC  
250 NW Franklin Ave. #402  
Bend, OR 97701  
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**CERTIFICATE OF SERVICE**  
Adversary Proceeding No. 14-03285-rld

I hereby certify that on September 22, 2015, I served a true copy of the foregoing *Motion to Extend Stay of Enforcement of Judgment Pending Post Judgment Motions to Amend Findings*, via first class mail, on the following:

Darian A. Stanford / Hunter Bitner  
Slinde Nelson Stanford  
111 SW 5<sup>th</sup> Ave., Ste 1940  
Portland, OR 97204  
*Attorney for Plaintiffs*

Dated: September 22, 2015.

/s/ Paul B. Heatherman  
Paul B. Heatherman - OSB #933000  
Attorney for Defendants/Debtors

2 - Motion to Amend Findings

Law Office of  
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